

REMARKS

This Amendment, submitted in response to the Office Action dated February 22, 2007, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Claims 1-17 are pending in the present application. Claims 2, 4, 6-8, 10, and 12-14 have been withdrawn from consideration. Claims 1, 3, 5, 9 and 11 are currently rejected.

I. Preliminary Matter

Applicant notes that the Examiner did not initial all of the references on the PTO Form-1449 filed on December 23, 2004. Consequently, Applicant requests a copy of the PTO-Form 1449 filed on December 23, 2004 with all of the references initialed.

II. Rejection of claims 1 and 11 under 35 U.S.C. § 102

Claims 1 and 11 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Masaki et al. (JP Pub. No. 07-007810). Claim 1 has been amended to include the subject matter of claim 9. Claim 9 has consequently been canceled.

Claim 1 now recites “wherein an electric connection body for electrically connecting the battery and the inverter unit is a metal plate.” In rejecting claim 9, the subject matter of which is now in claim 1, the Examiner asserts that Imai teaches the use of a plate and mounting board (base plate 170 and junction board 17) attached to the side of a battery to affix circuits. The Examiner asserts it would have been obvious to use a metal plate to connect the battery and the inverter unit in order to secure the inverter unit.

However, contrary to the Examiner's assertions, Imai does not disclose a metal plate (electric connection body) for electrically connecting a battery and an inverter unit. Imai merely discloses that a base plate 170 of a junction board is fixed to a frame on a side surface of a battery. A circuit containing protection functional components such as a main switch, a contactor, and a fuse is wired on the base plate 170. See abstract of Imai. However, there is no teaching or suggestion that the base plate 170 or the junction board 17 electrically connect a battery and an inverter unit. Most likely this is because Imai is not at all concerned with an inverter, let alone the connection between a battery and an inverter unit. For at least this reason, the Examiner's rejection is deficient.

Further, the combination of Imai with Masaki is not obvious. Masaki Fig. 1 discloses an inverter 6 and a battery 12 enclosed in an electromagnetic shielding container 14. Therefore, assuming *arguendo*, Imai discloses the claimed plate, there is no need for an electric connection body for electrically connecting the battery and the inverter unit of Masaki since the battery and inverter unit of Masako are already housed in the electromagnetic shielding container 14. Therefore, it is evident that the Examiner's reasoning is merely a result of hindsight. For at least the above reasons, claim 1 and its dependent claims should be deemed allowable.

III. Rejection of claims 3 and 5 under 35 U.S.C. § 103

Claims 3 and 5 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Masaki et al. (JP Pub. No. 07-007810) in view of Saka et al. (JP Pub. No. 2004-120936). Claims 3 and 5 should be deemed allowable by virtue of their dependency to claim 1 for at least the reasons set forth above. Moreover, Saka does not cure the deficiencies of Masaki and Imai.

IV. Rejection of claim 9 under 35 U.S.C. § 103

Claim 9 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Masaki et al. (JP Pub. No. 07-007810) in view of Imai (JP Pub. No. 2001-023700). Claim 1 has been amended to include the subject matter of claim 9. Consequently, the rejection of claim 9 is now moot.

V. Rejection of claims 3 and 5 under 35 U.S.C. § 103

Claims 3 and 5 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Masaki et al. (JP Pub. No. 07-007810). Claims 3 and 5 should be deemed allowable by virtue of their dependency to claim 1 for at least the reasons set forth above.

VI. New Claims

Applicant has added claims 15-17 to provide a more varied scope of protection. Claims 15-17 should be deemed allowable by virtue for their dependency to claim 1 for at least the reasons set forth above. Moreover, the art cited by the Examiner does not teach the elements of claims 15-17.

VII. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.111
U.S. Appl. No. 10/809,870

Attorney Docket No. Q80584

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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